Technical Management Section

Bureau of Air Quality SC Dept. of Health & Env. Control

December 13, 2006

Presented by: Anthony V. Keeler

Technical Management Section Functions

- Compliance Report Review and Tracking
- Region Liaison
- Inspection/Investigation Report Review
- Special Investigation Coordination
- Operations Data Management
- Compliance Monitoring
- Compliance Audits
- Technical Assistance

Send reports and submittals to:

Manager, Technical Management Section SC DHEC – Bureau of Air Quality 2600 Bull Street Columbia, South Carolina 29201

Report and submittal cover letters should include:

- Facility Name
- Facility Permit Number
- Permit Condition Numbers
- Reporting Period Dates

Fuel Oil Certifications

- May be required by permit conditions
- A Fuel Oil Certification Guidance document is available on the BAQ website under the Guidance Documents link
- Based on the percent sulfur content

12-Month Rolling Sums

- May be required by permit conditions
- Calculated for each month in the reporting period
 - For calculation purposes, more than 12 months of data should be included in the periodic reports
- Often require additional and/or supporting information to be submitted
 - e.g., Material Usage, VOC/HAP % content,
 Fuel Oil Certifications, etc.

12-Month Rolling Sums Report Frequency - Data needed

Monthly 12 months
Quarterly 14 months
Semiannual 17 months
Annual 23 months

- A 12-Month Rolling Sum is to be calculated for each month in the reporting period
- There would never be two of the same month in the 12-Month Rolling Sum total
- As another month is added, another month is dropped from the 12-Month Rolling Sum total

Fuel Oil: 12-Month Rolling Sum (4th Quarter)

Usage (Gallons)	Rolling Sum (Gallons)
300	300
350	650
400	1050
300	1350
250	1600
200	1800
190	1990
170	2160
150	2310
150	2460
160	2620
300	2920
325	2945
310	2905
	(Gallons) 300 350 400 300 250 200 190 170 150 150 160 300 325

Report Audits

- The correct BAQ mailing address
- Sufficient facility information
- Gaps in reporting or any missing reports
- The timeliness of report submittals
- The completeness of the reports
- Whether algorithms have been submitted (usually in initial submittal)
- Whether construction permit start-up letters have been submitted
- Attempt to align reporting periods of operating and construction permits

40 CFR 61(NESHAP) & 40 CFR 63 (MACT) Reports

- Received by Technical Management and sent to Air Toxics Section for tracking and review purposes
 - All NESHAP and MACT questions should be directed to the appropriate person in the Air Toxics Section
- NESHAP and MACT compliance reports should be sent as a separate report from other permit required reports and each NESHAP or MACT subpart should be clearly identified on the cover letter

Title V Periodic Reports and Annual Compliance Certifications

- Must contain a truth, accuracy, and completeness statement (TAC)
 - "I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate, and complete."
- Must be signed by the facility's "Responsible Official" as defined by South Carolina Air Pollution Regulation 61-62.70.2(cc)

TVACC Notes

- Title V Annual Compliance Certification (TVACC) must be submitted in order to document that a facility has complied with every term and condition of the TV permit for the previous year
- Use the most recent version of the TV permit from the reporting period
- Submitted within 45 days after the end of the reporting period
- Both EPA and DHEC must receive a copy of the TVACC and any revisions

TVACC Notes (cont.)

- When your Title V permit has been renewed
 - Submit new or updated operating ranges and algorithms
 - Close out the old Title V permit by submitting a "short" TVACC
- When your Title V permit has been revoked or closed
 - Close out the Title V permit by submitting a "short" TVACC and any remaining periodic reports

Visit the BAQ Website at

www.scdhec.gov/eqc/baq

Technical Management link includes information regarding staff contacts, answers to frequently asked questions, and TVACC guidance and forms

Technical Management Section

Manager
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Contact Information (County Assignments - See Appendix)

Staff Member	Phone Number	Email
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